

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHROME HEARTS LLC, a Delaware  
Limited Liability Company,

Plaintiff,

vs.

THE KOOPLES USA, INC., a  
Delaware Corporation; and DOES 1-10,  
inclusive,

Defendants.

Civil Action No. 1:19-cv-03263-JGK

**PLAINTIFF’S NOTICE OF  
MOTION AND MOTION TO  
ENFORCE PERMANENT  
INJUNCTION AND REQUEST  
FOR SANCTIONS AGAINST  
DEFENDANT**

**PLEASE TAKE NOTICE** that pursuant to FRCP 70(e) and Second Circuit case law, plaintiff Chrome Hearts LLC (“Plaintiff”) brings its Motion to Enforce Permanent Injunction and Request for Sanctions against defendant The Kooples USA Inc. (“Defendant”).

This Motion is made on the grounds that Defendant violated this Court’s Order adopting the Parties’ Stipulated Injunction by reselling clothing products bearing trademarks owned by Plaintiff. Plaintiff requests that this Court (1) find Defendant in contempt for noncompliance; and (2) order a separate hearing on the issue of compensatory damages and attorneys’ fees, including ordering Defendant to provide accounting and expenses related to the re-sale of the infringing products. Plaintiff will cause this Motion and all accompanying moving papers to be personally served on Defendant upon filing the same, and will provide the Court with a proof of service. Declaration of Tara A. Currie, ¶ 11; Exh. I.

This Motion is based on the instant Notice of Motion, the accompanying Memorandum of Points and Authorities, the supporting Declaration of Tara A. Currie, the pleadings and record in this action, and any further argument and evidence this Court may consider at or before any hearing on the Motion.

Dated: June 8, 2022

Respectfully Submitted,

By: /s/ Brent H. Blakely

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***Attorneys for Plaintiff***

***Chrome Hearts LLC***